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Of Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**

**LISA COURTNEY**

Plaintiff,

v.

**WALLOWA SCHOOL DISTRICT #12;  
Former Wallowa School District #12  
Superintendent MARC THIELMAN;  
Wallowa School District #12 Former School  
Board Chairperson WYLIE FREI;  
Wallowa School Board Member KAREN  
JOSI; School Board Member ED MILLAR;  
Wallowa School District #12  
Superintendent BOB SISK**

Defendants.

Case No. 09-837-SU

**DECLARATOIN OF CHARESE A.  
ROHNY IN SUPPORT OF  
PLAINTIFF'S MOTION TO EXTEND  
PRE-TRIAL DEADLINES**

I, Charese A. Rohny, state and declare under penalty of perjury the following:

1. I represent plaintiff, Lisa Courtney.
2. Plaintiff filed a complaint in federal district court on July 21, 2009.
3. The current discovery deadline is November 23, 2009.
4. On July 22, 2009, defense attorney Channing Bennett agreed to accept service on

behalf of all defendants.

5. On November 2, 2009, Mr. Bennett communicated to me that he could not accept service on behalf of Wylie Frei since Frei no longer worked for the district and Mr. Channing had no new contact information for him to communicate and obtain permission to accept.

6. Also, on November 2, 2009, Mr. Bennett indicated he had no objections to a 90 day extension.

7. Plaintiff has been diligently searching for defendant Frei since that time. Frei was just personally served the Summons and Complaint on November 17, 2009 in Ferdinand, Idaho.

8. At or about the same time that defendant Frei was served, Mr. Channing communicated to me that he represents defendant Frei who does not object to an extension of deadlines.

9. This is the first request for an extension of deadlines.

10. The parties need time to conduct discovery and attempt mediation.

11. This motion is filed in good faith and not for purposes of harassment or delay.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED: This 17<sup>th</sup> day of November, 2009.

Respectfully submitted,

**CHARESE ROHNY LAW OFFICE, LLC**

By: /s/ Charese A. Rohny

Charese A. Rohny OSB No. 953964  
Of Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing ***DECLARATION OF CHARESE A. ROHNY IN SUPPORT OF PLAINTIFF'S REQUEST FOR AN EXTENSION OF PRETRIAL DEADLINES*** on

J Channing Bennett  
GARRETT HEMANN ROBERTSON PC  
1011 Commercial NE  
P.O. Box 749  
Salem, Oregon 97308

by the following indicated method(s):

- \_\_\_\_\_ by **faxing and mailing** full, true, and correct copies thereof by faxing to the attorney at the fax number as above stated, which is the last-known fax number for the attorney's office, on the date set forth below; and by mailing in a sealed envelope with postage prepaid thereon, addressed as above stated, which is the last-known office address of the attorney, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.
- \_\_\_\_\_ by **mailing** full, true, and correct copies thereof in a sealed envelope with postage prepaid thereon, addressed as above stated, which is the last-known office address of the attorney, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.
- \_\_\_\_\_ by causing full, true and correct copies thereof to be **hand-delivered** to the attorney at either the attorney's last-known office address as above stated, on the date set forth below, or at another location where the attorney is known to be, on the date set forth below.
- \_\_X\_\_ by mailing full, true and correct copies thereof to [cbennett@ghrlawyers.com](mailto:cbennett@ghrlawyers.com).

DATED this 17<sup>th</sup> day of November, 2009

By: Charese A. Rohny  
Charese A. Rohny  
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(503) 293-5770  
Of Attorneys for Plaintiff